

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Tri-State Paper, Inc., <i>Debtor.</i>	Case No. 23-13237-pmm Chapter 11
Tri-State Paper, Inc., <i>Plaintiff,</i> v. Nonna Rosa III, LLC, <i>Defendant.</i>	Adversary No. 23-00087-pmm

Plaintiff's Motion to Compel Discovery

Plaintiff Tri-State Paper, Inc., through its attorney, moves this Court as follows:

1. The Clerk recently entered judgment against Defendant Nonna Rosa III, LLC.
2. On March 15, 2024, the Plaintiff served the Defendant with the interrogatories attached as Exhibit A.
3. Because the Defendant has failed to respond to the interrogatories, the Plaintiff requests that the Court issue an order compelling the Defendant's response.
4. The Plaintiff requests that the Court grant this motion without a hearing as allowed by L.B.R. 9014-2(13).

For those reasons, the Court must grant relief in the form of order attached, and further in the Plaintiff's favor if necessary and proper under the law.

Date: May 28, 2024

CIBIK LAW, P.C.
Attorney for Plaintiff

By: 

Mike Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
help@cibiklaw.com

Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: May 28, 2024



Mike Assad